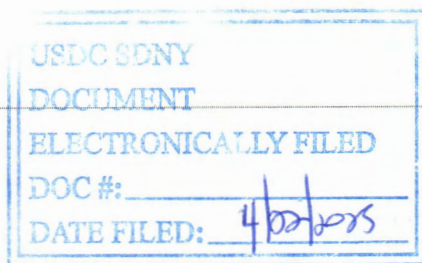




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April 21, 2025

VIA ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York

Re: A.P. v. Weinstein, et al., No.: 25 Civ. 1706 (CM) (BCM)

Dear Judge McMahon:

We represent The Walt Disney Company, Disney Enterprises Inc., and Miramax Holding Corp. ("Defendants" or the "entity-Defendants") in the above-captioned case. I write to request that the court 1) adjourn to a later date the upcoming pretrial conference scheduled for Thursday, April 24 at 10:15a.m., and 2) enter a briefing schedule for Defendants' Oppositions to Plaintiff's Motion for Leave to Proceed Anonymously and Defendants' Motions To Dismiss.

Pursuant to the Court's March 20 Order scheduling a pretrial conference and instructing the parties to confer and complete the Civil Case Management Plan, *see* ECF No. 11, the parties met and conferred on Friday, April 18, but were unable to reach an agreement. For the reasons discussed below, we ask that the Court consider our request for a briefing schedule in lieu of an in-court appearance this Thursday.

First, as we informed Plaintiff's counsel, we intend to submit an Opposition to Plaintiff's Motion for Leave to Proceed Anonymously and a Motion To Dismiss. Counsel for Defendant Weinstein also represented that he intends to file an Opposition to Plaintiff's Motion for Leave to Proceed Anonymously and a Motion To Dismiss. We respectfully request that the Court set a briefing schedule for these anticipated motions prior to entering the Civil Case Management Plan.

Second, counsel for Defendant Weinstein is in the middle of the criminal re-trial of Mr. Weinstein and I am in a three-week trial in New Jersey. Given these scheduling and logistical issues, we request that the pretrial conference be adjourned to a later date to occur after receiving the benefit of the court's ruling on the Motions To Dismiss.

Alternatively, if the Court decides not to adjourn the pretrial conference, we request that the parties be permitted to appear telephonically.

4/22/2025
I am on trial so
this week's conference
must be cancelled in any
event. Please submit by our
opposition to the motion
to proceed anonymously
by April 28. The
your motion to dismiss
by May 16.

MEMO ENDORSED

This is the Defendants' first request for an adjournment, and it will not affect any other scheduled dates. Plaintiff has not agreed to these requests and has noted their opposition to Defendants' anticipated motions and any requested stay in the case.

We appreciate the Court's consideration of our request.

Respectfully submitted,

/s/ Tracey Salmon-Smith
Tracey Salmon-Smith

*Counsel for Defendants The Walt Disney
Company, Disney Enterprises Inc., and
Miramax Holding Corp.*

cc: Counsel of Record Via ECF

CERTIFICATE OF SERVICE

I, Tracey Salmon-Smith, hereby certify that on April 21, 2025, I caused a true and correct copy of the foregoing letter to be served via the Court's electronic filing system on all counsel of record appearing on ECF.

Dated: April 21, 2025

/s/ Tracey Salmon-Smith
Tracey Salmon-Smith